

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

JUDY JIEN, *et al.*,

Plaintiffs,

v.

PERDUE FARMS, INC., *et al.*,

Defendants.

Civil Action No.: 1:19-cv-2521-SAG

**CERTAIN DEFENDANTS’
MOTION TO DISMISS PLAINTIFFS’ CONSOLIDATED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure Rule 12(b)(6), Defendants Allen Harim Foods, LLC; Amick Farms, LLC; Case Foods, Inc.; Case Farms Processing, Inc.; Fieldale Farms Corporation; George’s, Inc.; George’s Chicken, LLC; George’s Foods, LLC; George’s Processing, Inc.; Harrison Poultry, Inc.; House of Raeford Farms, Inc.; House of Raeford Farms of Louisiana, LLC; JCG Foods of Alabama, LLC; JCG Foods of Georgia, LLC; JCG Industries, Inc.; Koch Foods, Inc.; Koch Foods LLC; Koch Foods of Alabama, LLC; Koch Foods of Ashland, LLC; Koch Foods of Cumming LLC; Koch Foods of Gadsden, LLC; Koch Foods of Gainesville LLC; Koch Foods of Mississippi LLC; Mar-Jac Holdings, Inc.; Mar-Jac Poultry, Inc.; Mar-Jac Poultry, LLC; Mar-Jac Poultry AL, LLC; Mar-Jac Poultry MS, LLC; Mountaire Farms, Inc.; Mountaire Farms of Delaware, Inc.; O.K. Foods, Inc.; Ozark Mountain Poultry, Inc.; Simmons Foods, Inc.; and Simmons Prepared Foods, Inc. (collectively, “Movants”) request that the Court dismiss Plaintiffs’ Consolidated Complaint for failure to state a claim.

Movants fully join All Defendants’ Joint Motion to Dismiss Plaintiffs’ Consolidated Complaint, and for the reasons set forth in that Motion and the separately-filed memorandum in

support thereof, Plaintiffs' Consolidated Complaint should be dismissed in its entirety as to all Defendants. In addition, the Consolidated Complaint should be dismissed as to Movants for the independent reasons set forth herein.

Date: November 22, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2019, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

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